

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery Master

**NOTICE OF MOTION TO
STRIKE PLAINTIFFS'
MOTION FOR SANCTIONS**

**NOTICE OF MOTION TO STRIKE PLAINTIFFS' MOTION FOR
SANCTIONS FOR FAILURE TO COMPLY WITH FED. R. CIV. P. 37(A)(1)
AND 37(D)(1)(B)**

To: Adam M. Slater, Esquire
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PLEASE TAKE NOTICE that on May 28, 2021, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an ORDER striking Plaintiffs' Motion for Sanctions for Defendant ZHP's Obstruction and Failure to Provide Responsive Deposition Testimony.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

May 28, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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